

**COMMONWEALTH OF VIRGINIA**  
**Department of Environmental Quality**  
**South Central Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS**

Lynchburg Foundry, LLC d/b/a INTERMET Archer Creek Foundry  
Campbell County, Virginia  
Permit No. SCRO30121

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Lynchburg Foundry, LLC d/b/a INTERMET Archer Creek Foundry has applied for a Title V Operating Permit for its Campbell County facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: \_\_\_\_\_ Date: 10/5/07  
Patrick Corbett  
(434)582-6230

Air Permit Manager: \_\_\_\_\_ Date: \_\_\_\_\_  
David J. Brown

Regional Director: \_\_\_\_\_ Date: 10/5/07  
T.L. Henderson

## **FACILITY INFORMATION**

### Permittee

Lynchburg Foundry, LLC d/b/a INTERMET Archer Creek Foundry  
P.O. Box 11589  
Lynchburg, VA 24506

### Facility

Lynchburg Foundry, LLC d/b/a INTERMET Archer Creek Foundry  
1132 Mt. Athos Road, Campbell County, Virginia

County Plant ID No. 51-031-00101

## **SOURCE DESCRIPTION**

NAICS/SIC Code – 331511/3321 – gray and ductile iron foundry

Lynchburg Foundry, LLC d/b/a INTERMET Archer Creek Foundry (AC) is a manufacturer of gray and ductile iron parts for the automotive and other industries from scrap metal and foundry returns. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. The facility is permitted to melt 299,400 tons of metal per year.

The facility is a Title V major source of PM-10, HAP and VOC. For all pollutants, this source is located in a Prevention of Significant Deterioration area as designated in 9 VAC 5-20-205, and is a PSD major source (PM, PM-10). The facility is currently permitted under a minor NSR Permit issued on December 7, 2006 as amended February 23, 2007 and April 30, 2007; a minor NSR permit dated June 25, 2001 and a minor NSR permit dated September 5, 2001.

## **COMPLIANCE STATUS**

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

## **EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION**

As a general review, AC's manufacturing process begins with scrap metal received in the storage

area. The scrap is prepared (ACE01) and charged into one of two cupolas (ACE02). The cupolas can only operate one at a time. The particulate emissions from the cupola are treated by a particulate conditioning system (ACE04) to obtain non-hazardous baghouse dust. The molten metal is then poured into one of two shaking ladles (ACE05) where desulfurization by the addition of calcium carbide occurs. The resultant metal is transferred to holding furnaces (ACE07, 08 and 09) for residence time and homogeneity. The metal is then transferred to ladles (ACE06) where metal chemistry is adjusted through the addition of magnesium (inoculation). The metal is moved to one of two pouring areas (ACE12 and 13, North and South Pouring Lines) where the metal is poured into molds traveling one of two rail car conveyors (ACE14 and 15, North and South Cooling Lines). The cars continue along the length of the cooling rail such that cooling is sufficient. The molds (metal casting plus sand mold) are then removed from the carts and transferred to a vibrating conveyor (ACE16 and 17). This two-step process is referred to as Punchout/Shakeout. On the conveyor, the casting and sand are separated. The casting cools during this traverse along the conveyor (ACE18 and 19). Knockoff/Sorting (ACE45) is the first step in the Finishing process. Knockoff is the process of removing extra metal from the casting, created during the pouring process. Sorting of castings for additional processing also occurs on this conveyor. Finishing of the castings is completed through shot blasting (ACE20), and other finishing activities (ACE21) such as grinding. Painting (ACE22) and rust-proofing (ACE23) of castings can also occur, depending on AC's contract requirements.

The casting's shape is determined by the contents of the "mold car". The two major parts of making a casting in the appropriate shape are molds and cores. Molds are sand pressed by a pattern such that the overall shape and outer dimensions of the casting will be appropriate when the metal is poured into the mold cart. Mold sand is mixed with other products in a muller (ACE24A and B) to obtain sand that will be capable of forming a mold to support the manufacture of castings. The other aspect is the core. The core is placed inside the mold to create voids in the metal where a casting requires such voids (not all castings have this requirement). Cores are created in the Core making Operations portion of AC. Core sand is mixed with a resin in a muller (ACE25A1, A2, B1, and B2) at a specified ratio to obtain the necessary core properties. The sand is then transported to a core machine (ACE26-35) where triethylamine (TEA) is used to catalyze the resin (delivered by ACE38), hardening the core such that a casting can be made. These two processes required sand handling systems (ACE39) and waste sand handling (ACE47 through 53).

The emissions units at this facility are those units as described in the table of Section II.A of this Title V permit.

The following is a description of the jargon used by AC to describe the several air pollution control devices (APCDs) located at the facility. The nomenclature of the Title V permit and AC's jargon are sufficiently different such that a description is beneficial. This description

conveys no requirements on AC or the DEQ and is for informational purposes only.

**Cupola Baghouse (ACDC02)** – Controls the cupola and EDAP (particulate conditioning system)

**Cupola Combustor (ACC01)** – Controls CO from cupola. It is also used to meet the volatile organic HAP (VOHAP) standard in Subpart EEEEE.

**Wheelabrator Baghouse (North – ACDC06; South – ACDC08; Mid – ACDC07)** – These units control finishing (grinding and shot blasting) equipment.

**ETA Baghouse (North – ACDC14; South – ACDC12; #5 or Mid – ACDC13)** – These units control sand handling equipment and Punchout/Shakeout. The North and South units each have two modules (#s 1 and 2).

**Core room baghouse (ACDC05)** – This controls the core mullers which mix sand (virgin) and binder/resin used to make the cores. It vents internally to the plant work area.

**TEA Scrubber (ACC16)** – The scrubber controls TEA emissions from the core machines during core production.

**Farr Collector (ACDC01)** – Controls Knockoff/Sorting which is the first step in the finishing process and is the next step in the process after Punchout/Shakeout.

**Melt Baghouse (ACDC03)** – Controls Metal Treatment (mostly the inoculation portion) and is sometimes called Metal Treatment baghouse. This baghouse exhausts an area but most of the emissions are collected from inoculation based on intake location.

**American Baghouse (ACDC18)** – This controls two previously uncontrolled stacks/vents above the North Cooling Line. It formerly controlled the Metal Treatment area but was replaced by a new baghouse. The new Metal Treatment baghouse (Melt Baghouse) retains the ACDC03 designation and this reactivated baghouse now uses the new ACDC18 designation.

Reconnection of this baghouse (ACDC18) to the mold cooling line was the result of a Supplemental Environmental Project (SEP) from the Consent Order issued on July 8, 2005.

**Warehouse Baghouse (N Ware E – ACDC09; N Ware W – ACDC19; S Ware N – ACDC10; S Ware S ACDC11)** – There are 4 modules controlling finishing and grinding performed in the warehouse. AC does not generally operate this machinery.

## EMISSIONS INVENTORY

Emissions are summarized in the following tables.

2006 Actual Emissions

	2006 Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	NO <sub>x</sub>
Total	49.06	10.68	10.66	200.21	26.99

2006 Hazardous Air Pollutant Actual Emissions

Pollutant	2006 Hazardous Air Pollutant Emission in Tons/Yr
Triethylamine (TEA)	0.21
Glycol Ether	0.66
Lead (Pb)	0.30

### EMISSION UNIT APPLICABLE REQUIREMENTS

The following section discusses requirements for the emissions units at AC. These requirements come from AC's NSR permit dated December 7, 2006 as amended February 23, 2007 and April 30, 2007 (covering the majority of the plant), NSR permit dated June 25, 2001 (covering used/waste sand handling), NSR permit dated September 5, 2001 (covering the slag processing plant) and applicable federal requirements. The conditions are not repeated verbatim from the permit.

#### Citations

The following citations denote the underlying authorities to implement the specific conditions in the NSR permits. Certain citations are followed by a citation in parentheses. The first citation constitutes the citation in the permit. The minor NSR regulations were re-organized in 2002. The citation in parenthesis is the corresponding citation after the regulation change for minor NSR permitting.

##### Minor NSR permit dated June 25, 2001

9 VAC 5-50-260, 9 VAC 5-80-10 H (9 VAC 5-80-1180), 9 VAC 5-50-80, 9 VAC 5-50-50

##### Minor NSR permit dated September 5, 2001

9 VAC 5-50-260, 9 VAC 5-50-20, 9 VAC 5-50-90, 9 VAC 5-80-10 (9 VAC 5-80-1180), 9 VAC 5-80-10 H (9 VAC 5-80-1180), 9 VAC 5-170-160 (9 VAC 5-80-1180), 9 VAC 5-50-50, 9 VAC 5-50-30

##### Minor NSR permit dated December 7, 2006 as amended February 14, 2007 and April 30, 2007

9 VAC 5-80-1180, 9 VAC 5-50-260, Consent Order dated July 8, 2005, 9 VAC 5-50-20, 9 VAC 5-50-50, 9 VAC 5-50-30 F

The facility-wide requirement for visible emissions apply to new & modified sources (9 VAC 5-50-80). There are no units at AC subject to the existing source visible emission standard (9 VAC 5-40-80).

**Section III of Title V Permit** – ACE03, ACE10, miscellaneous space heaters including makeup air handling units (ACE11), and storage tanks (ACT02 through ACT16)

**Limitations**

This section is based on the 12/7/06 minor NSR permit. Requirements include limitations on fuel throughput and fuel types are included to reflect emissions limitations. The new and modified source visible emission standard is included.

**Monitoring**

Weekly visible emissions observations are required for fuel burning equipment stacks.

For the natural gas space heaters (ACE11), visible emissions should not be present. Additionally, the space heaters vent internally to the work area. As such, no visible emission evaluation for the natural gas space heaters are required.

**Recordkeeping**

Records of fuel usage and visible emissions observations must be kept to demonstrate compliance.

**Testing**

None

**Reporting**

None

**Streamlined Requirements**

None

**Section IV of Title V Permit** – Charge Preparation Operations (ACE01)

**Limitations**

This section is based on the 12/7/06 minor NSR permit. Requirements include limitations on particulate emissions and the new and modified source visible emission standard.

**Monitoring**

Weekly visible emissions observations are required.

**Recordkeeping**

Records of visible emissions observations must be kept to demonstrate compliance.

**Testing**

None

**Reporting**

None

**Streamlined Requirements**

None

**Section V of Title V Permit** – Cupolas and Particulate Conditioning System (ACE02 and ACE04)

**Limitations**

This section is based on the 12/7/06 minor NSR permit. The cupolas and conditioning system (EDAP) must be controlled by fabric filter (PM) and a combustor (CO). Limitations on annual metal melted and EDAP throughputs reflect emissions limitations. The new and modified source visible emission standard is included.

The cupola is subject to 40 CFR 63 Subpart EEEEE. Requirements for this MACT are set out in Section XV.

**Monitoring**

Weekly visible emissions observations for the uncontrolled area stacks/vents, fabric filter differential pressure, combustor temperature are required. A baghouse leak detection system was installed as part of a Consent Order that previously amended 12/7/06 NSR permit (issued 3/16/06) to require the use of this system.

Compliance Assurance Monitoring (CAM) is required for CO from the cupola<sup>1</sup>. CO is controlled by the combustor (ACC01). The cupola's pre-control potential to emit is above major source levels. The cupola is subject to an emission standard for CO. AC submitted, and DEQ approved, a plan to monitor combustor outlet temperature. Conditions IV.B.5 through IV.B.16 cover CAM requirements.

**Recordkeeping**

Records of annual throughputs, performed maintenance, and monitoring results must be maintained.

**Testing**

Once every five years the cupola must be tested to demonstrate compliance with the pound per hour limitations for nitrogen oxides, sulfur dioxide, and carbon monoxide.

---

<sup>1</sup> The other controlled major pollutant is particulate matter. The baghouse is subject to monitoring under the Foundry MACT and is exempt from CAM.

**Reporting**

CAM reporting requirements are contained in this section. MACT reporting is contained in Section XV.

**Streamlined Requirements**

None

**Section VI of Title V Permit** – Metal Treatment Operations (ACE05 through ACE09)**Limitations**

This section is based on the 12/7/06 minor NSR permit. Fabric filters are required for control of Metal Treatment Operations. The capture of emissions is described in the May 12, 1997 application amendment. The majority of emissions collected by the fabric filter should be from inoculation (when pouring of metal from holding furnaces (ACE07-ACE09) into the transfer and treatment ladles (ACE06)) due to the collection point location. Emissions limitations for all of metal treatment are included. These limits consider both the controlled and uncontrolled emissions from this entire operation. The new and modified source visible emissions standard is also included.

**Monitoring**

Weekly visible emissions observations for uncontrolled stacks/vents are required.

Metal Treatment is subject to CAM (Conditions VI.B.3 through VI.B.14). While the fabric filter only controls a portion of the emissions from this area (as described in the Limitations section above), this filter is necessary to meet the emissions standards for the area. The area has a pre-control potential above major levels. The CAM plan monitors differential pressure and requires daily visible emissions observations to show the fabric filter is operating properly. The CAM requirements consider the above mentioned May 12, 1997 application amendment information to clarify the operation and design of the filter system.

**Recordkeeping**

Records of monitoring, maintenance and visible emissions observations must be kept to demonstrate compliance.

**Testing**

Once every five years, AC must test Metal Treatment for particulate matter (PM-10). The emission limitation considers controlled and uncontrolled emissions from the metal treatment process. The testing condition requires AC to demonstrate compliance with the emissions limit, accounting for the application amendment information, through stack testing.



**Reporting**

CAM reporting requirements are contained.

**Streamlined Requirements**

None

**Section VII of Title V Permit** – Mold Pouring Operations (ACE12 and ACE13)

**Limitations**

This section is based on the 12/7/06 minor NSR permit. Requirements include emissions limitations and the new and modified source visible emission standard.

Pouring is subject to 40 CFR 63 Subpart EEEEE. Requirements for this MACT are set out in Section XV.

**Monitoring**

Weekly visible emissions observations are required.

**Recordkeeping**

Records of visible emissions observations must be kept to demonstrate compliance.

**Testing**

None

**Reporting**

None

**Streamlined Requirements**

None

**Section VIII of Title V Permit** – Mold Cooling System (ACE14 and ACE15)

**Limitations**

This section is based on the 12/7/06 minor NSR permit. Requirements include emissions limitations, fabric filter control and the new and modified source visible emission standard.

Fabric filter control is required in two conditions. The first reflects the 12/7/06 NSR permit requirements (ACDC12 through ACDC14). The second fabric filter (ACDC18) was required as part of a SEP in the Consent Order issued on July 8, 2005. This condition was added to reflect this agreement.

**Monitoring**

Differential pressure and weekly visible emissions observations are required. A baghouse leak detection system was installed and is a requirement of the 12/7/06 NSR permit.

**Recordkeeping**

Records of maintenance and visible emissions observations must be kept to demonstrate compliance.

**Testing**

None

**Reporting**

None

**Streamlined Requirements**

None

**Section IX of Title V Permit** – Mold Punchout / Shakeout Operations (ACE16 through ACE19)

**Limitations**

This section is based on the 12/7/06 minor NSR permit. Requirements include fabric filter control, emissions limitations and the new and modified source visible emission standard.

**Monitoring**

Differential pressure, weekly visible emissions for uncontrolled stacks, and a baghouse leak detection system are required. The baghouse leak detection system was installed due to a Consent Order.

Punchout/Shakeout is subject to CAM (Conditions IX.B.3 through IX.B.15). The plan monitors differential pressure and daily visible emissions observations to ensure the proper operation of the baghouse.

**Recordkeeping**

Records of monitoring, maintenance and visible emissions observations must be kept to demonstrate compliance.

**Testing**

None

**Reporting**

CAM reporting requirements are included.

**Streamlined Requirements**

None

**Section X of Title V Permit** – Castings Finishing Operations (ACE20, ACE21, ACE22, and ACE23)

**Limitations**

This section is based on the 12/7/06 minor NSR permit. Requirements include emissions limitations, a castings throughput limitation and the new and modified source visible emission standard.

**Monitoring**

Weekly visible emissions observations are required and fabric filter differential pressure must be monitored. A baghouse leak detection system was installed due to a Consent Order.

**Recordkeeping**

Records of maintenance, castings throughput and visible emissions observations must be kept to demonstrate compliance.

**Testing**

None

**Reporting**

None

**Streamlined Requirements**

None

**Section XI of Title V Permit** – Core making Operations (ACE26 through ACE35, ACE25A1, ACE25A2, ACE25B1, ACE25B2, ACE37, ACE38, and ACT01)

**Limitations**

This section is based on the 12/7/06 minor NSR permit. Requirements include emissions limitations, control of triethylamine (TEA) through the core machine (ACE35) by wet scrubber (ACC16), fabric filter on the core mullers (venting internally), resin and TEA usage limits, 10% opacity on the scrubber and the new and modified source visible emission standard.

The VOC limitations (Conditions XI.A.6 and XI.A.7) for ACE35 are the result of a minor NSR permit for the installation of two core machines. Only one of the core machines was installed, the approval for installation of the second machine has expired. The limit is separated into two parts based on the minor NSR review. The core mullers mix resin with sand, emitting VOC.

Condition XI.A.7 addresses the emission limitation for the core machine project, emitted at the core mullers. TEA is utilized as a catalyst to harden the sand/resin mixture in the core machines. The TEA is exhausted and controlled by the scrubber (ACC16), which was required as part of the installation. Condition XI.A.6 addresses the VOC emissions solely from TEA usage in the core machine. As such, wording is used to clarify that compliance with Condition XI.A.6 must be based on measuring TEA. The wording does not limit the scope of information, test methods, or any other available means of assessing TEA emissions through the scrubber to demonstrate compliance with this limit.

The annual VOC limitation (Condition XI.A.8) applies to the overall resin emissions and TEA usage for all of core making operations (all core machines and all mullers). It is split into two categories to ensure each contribution is appropriately delineated.

The core machines are subject to 40 CFR 63 Subpart EEEEE for TEA. All core machines are controlled by the scrubber (ACC16) to meet the MACT emissions standards. Section XV deals with the requirements of the MACT.

### **Monitoring**

Scrubber differential pressure, liquid flow rate and pH, weekly visible emissions observations (for the scrubber, uncontrolled area stacks and the dip tank) are required.

### **Recordkeeping**

Records of TEA and resin usage, maintenance, vendor test data and visible emissions observations must be kept to demonstrate compliance.

### **Testing**

None

### **Reporting**

None

### **Streamlined Requirements**

None

**Section XII of Title V Permit** – Mold Sand and Core Sand Handling Systems (ACE39, ACE24A, and ACE24B)

### **Limitations**

This section is based on the 12/7/06 minor NSR permit. Requirements include emissions limitations, sand throughput, fabric filter control and the new and modified source visible emission standard.

The core mullers are appropriately considered part of core making operations (Section XI). However, when the emissions limitation and corresponding throughput for sand handling was calculated, the core mullers were included. Sand throughput is tracked as the amount of sand through mold cars, efficiently tracking sand usage through the entire plant. Language noting the previous determination included the core mullers, even though they are part of a different process has been added to Condition XII.A.2 and XII.A.3. The core mullers are not considered part of sand handling for any other purpose.

**Monitoring**

Fabric filter differential pressure, a baghouse leak detection system and weekly visible emissions observations (uncontrolled vents/stacks) are required.

Sand handling is subject to CAM (Conditions XII.B.3 through Condition XII.B.14). The fabric filters controlling sand handling are the same as those controlling Punchout/Shakeout (Section IX). The CAM plan for sand handling is identical to the Punchout/Shakeout plan. All conditions are repeated in this section in lieu of referencing Section IX of the permit.

**Recordkeeping**

Records of monitoring, sand throughput, maintenance and visible emissions observations must be kept to demonstrate compliance.

**Testing**

None

**Reporting**

CAM reporting is included.

**Streamlined Requirements**

None

**Section XIII of Title V Permit** – Used/Waste Sand and Baghouse Dust Storage and Load-out System (ACE47 through ACE53)

**Limitations**

This section is based on the 6/25/01 minor NSR permit. Requirements include a throughput limitation, bin vents on the silos, and enclosure and wet suppression for mixing and load-out. Visible emission standards of 5% (bin vents) and 10% (mixing and load-out) are included.

**Monitoring**

Weekly visible emissions observations are required.

**Recordkeeping**

Records of throughput and visible emissions observations must be kept to demonstrate compliance.

**Testing**

None

**Reporting**

None

**Streamlined Requirements**

None

**Section XIV of Title V Permit** – Cupola Slag Processing Operation (ACE54 through ACE58)

**Limitations**

This section is based on the 6/25/01 minor NSR permit. Requirements include approved fuel, hours of operation limit, a requirement to only process cupola slag, a slag throughput limitation, and visible emissions limitations.

**Monitoring**

Fuel certifications and weekly visible emissions observations are required.

**Recordkeeping**

Visible emission observations, annual throughput of slag, annual hours of operation for the engines, fuel certifications, and logs of material processed are required records.

**Testing**

None

**Reporting**

None

**Streamlined Requirements**

None

**Section XV of Title V Permit** – Iron and Steel Foundries MACT Requirements (40 CFR 63 Subpart EEEEE)

**MACT Conditions**

AC is subject to this MACT. A general reference to the MACT has been included in lieu of

specific requirements based on the EPA proposed amendments on April 17, 2007. These changes are of enough significance that conditions based on the current MACT will be insufficient to convey the applicable requirements.

**Section XVI of Title V Permit** – Surface Coating of Miscellaneous Metal Parts and Products MACT Requirements (40 CFR 63 Subpart MMMM)

**Limitations**

AC has an existing general use coating facility, an affected source under this MACT. The facility does not use more than 250 gallons of coating in a 12-month period. Currently, the facility is not subject to this MACT (40 CFR 63.3881). Based on discussions between DEQ and EPA, the MACT will become applicable on the first day of the month directly following the first 12-month period with more than 250 gallons of coating used.

Because AC is not currently subject to this MACT, a general reference to the requirements of 40 CFR 63 Subpart MMMM is included. Language has been added to reflect when applicability will begin as discussed above and to require records of coating usage sufficient to determine MACT applicability.

**Section XVII of Title V Permit** – Organic Liquids Distribution (Non-Gasoline) MACT Requirements (40 CFR 63 Subpart EEEE)

**Limitations**

AC does not have any unit subject to emissions limitations in this MACT, only recordkeeping requirements. Initial notifications have been submitted. As such, a general reference requiring compliance with the MACT is included.

**Section XVIII of Title V Permit** – Industrial, Commercial and Industrial Boilers and Process Heaters MACT Requirements (40 CFR 63 Subpart DDDDD)

**Limitations**

AC does not have any unit subject to emissions limitations in this MACT, only recordkeeping requirements. Initial notifications have been submitted. As such, a general reference requiring compliance with the MACT is included.

**Section XIX of Title V Permit** – Facility Wide Conditions

**Limitations**

The new and modified source visible emission standard for any vent not already covered is included.

**Monitoring**

Weekly visible emissions observations are required for all stacks or vents not covered by a previous section.

Corrections to the original survey plan have been submitted by AC. The requirement to submit a survey plan has been satisfied for this permit term. This plan has been approved by the DEQ.

### **Recordkeeping**

A log of visible emissions observations must be kept to demonstrate compliance.

### **OTHER CONSIDERATIONS**

AC installed bag leak detectors on three baghouses resulting from a Consent Order. AC is currently collecting data on their operation. Sufficient data collection and experience should allow AC to utilize these detectors in lieu of daily (CAM) or weekly visible emissions monitoring. The DEQ intends to review collected data with AC on a periodic basis to ensure the best monitoring data available is utilized.

### **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

### **STATE ONLY APPLICABLE REQUIREMENTS**

AC has a state-only enforceable State Operating Permit (SOP) dated August 19, 2002. This state-only enforceable SOP and its requirements are not included in the Title V permit.

### **FUTURE APPLICABLE REQUIREMENTS**

40 CFR 63 Subpart M, the Surface Coating of Miscellaneous Metal Parts and Products MACT (Subpart M) does not apply to facilities that use less than 250 gallons per year of HAP-containing coatings. AC does not currently use more than 250 gallons; however, no limit prevents AC from exceeding this throughput if supported by the market. Language denoting when Subpart M will become applicable is contained in this renewal. Due to the throughput exclusion, these requirements are future applicable requirements with no specific compliance date<sup>2</sup>. The Regulations require record-keeping that demonstrate continuous exempt status. As such, AC is required to keep records of coating usage to show continuous

---

<sup>2</sup> It is possible that AC will never exceed the applicability threshold and these conditions will never become applicable requirements.



applicability of the throughput exemption.

## **INAPPLICABLE REQUIREMENTS**

### **Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

40 CFR 60 Subpart IIII (the NSPS) contains standards for stationary compression ignition engines. 40 CFR 60.4200 states the NSPS applies to engines manufactured after April 1, 2006. AC operates engines manufactured prior to this date. The NSPS does not apply. If AC adds engines at a later date, these engines may be subject to the NSPS.

### **Stationary Reciprocating Internal Combustion Engines MACT**

40 CFR 63 Subpart ZZZZ (RICE MACT) contains standards for stationary engines. 40 CFR 63.6590(b)(3) exempts existing emergency generators from all requirements, including initial notification, of the RICE MACT. AC only operates one engine greater than 500 bhp (ACE58) which functions as an emergency generator. AC has no requirements from the RICE MACT. EPA has proposed amendments to the RICE MACT which may impact applicability for the engines rated at less than 500 bhp operating at AC. AC should be aware that such changes are currently pending.

### **BART (40 CFR Part 51) and Virginia's Regional Haze State Implementation Plan**

AC has BART-eligible units. Based on modeling, AC showed these units had a less than 0.5 deciview impact on any Class I area. The notice of this determination was published in Lynchburg's *The News&Advance* on January 17, 2007. Therefore, AC does not have any applicable requirements due to BART.

## **COMPLIANCE PLAN**

None

## **INSIGNIFICANT EMISSION UNITS**

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units are shown in the table contained in Section II.B of the permit.

## **CONFIDENTIAL INFORMATION**

No confidential information request has been made. All portions of the Title V permit and application are available for public review.

## **PUBLIC PARTICIPATION**

The proposed permit will be published in Lynchburg's *The News&Advance* on July 19, 2007. The public comment period ran from July 20, 2007 to August 18, 2007.